

For Six Month Period Ending

4 DEC 1982

(Insert date)

Name of Registrant

Registration No. **1750**

ARNOLD & PORTER

Business Address of Registrant

**1200 New Hampshire Avenue, N.W.
Washington, DC 20036**

I—REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual: **N/A**

- | | | |
|-----------------------|------------------------------|-----------------------------|
| (1) Residence address | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (2) Citizenship | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (3) Occupation | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

(b) If an organization:

- | | | |
|--------------------------|------------------------------|--|
| (1) Name | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (2) Ownership or control | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (3) Branch offices | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

2. Explain fully all changes, if any, indicated in item 1.

N/A

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

Name

Position

Date Connection
Ended

See Attachment 3A

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?
 Yes ☒ No ☐

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
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See Attachment 4A

5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal?
 Yes ☐ No ☒

If yes, identify each such person and describe his services.

N/A

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
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See Attachment 6A

7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒ ***/**

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
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***/ However, see Attachment 7A for information relating to persons who were hired previously, but began to render services to one or more of the Registrant's foreign principals during this period.**

II—FOREIGN PRINCIPAL

(PAGE 3)

8. Has your connection with any foreign principal ended during this 6 month reporting period?

Yes ☒

No ☐

If yes, furnish the following information:

Name of foreign principal

Date of Termination

See Attachment 8A

9. Have you acquired any new foreign principal¹ during this 6 month reporting period?

Yes ☐

No ☒

If yes, furnish following information: **N/A**

Name and address of foreign principal

Date acquired

10. In addition to those named in Items 8 and 9, if any, list the foreign principals¹ whom you continued to represent during the 6 month reporting period.

See Attachment 10A

III—ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

See Attachment 11A

¹The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity² as defined below?
Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

See Attachment 12A

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully.

N/A

²The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV—FINANCIAL INFORMATION

14. (a) RECEIPTS—MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.³

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
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See Attachment 14A

Total

(b) RECEIPTS—THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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N/A

³A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(c).

⁴Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) **DISBURSEMENTS—MONIES**

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes ☒ No ☐

(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

<i>Date</i>	<i>To Whom</i>	<i>Purpose</i>	<i>Amount</i>
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See Attachment 15A

Total

15. (b) DISBURSEMENTS—THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value⁵ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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N/A

(c) DISBURSEMENTS—POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☐ No ☒ */

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
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*/ However, see Attachment 15C for information relating to persons who have filed Short Form Registration Statements and who have made political contributions in connection with elections for federal offices.

V—POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☒ No ☐

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

Republic of Venezuela

⁵Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda? Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

N/A

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:

☐ Radio or TV broadcasts ☐ Magazine or newspaper articles ☐ Motion picture films ☒ Letters or telegrams
☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches

☒ Other (specify) **Intergovernmental Declaration**

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:

☒ Public Officials ☐ Newspapers ☐ Libraries
☐ Legislators ☐ Editors ☐ Educational institutions
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups
☐ Other (specify)

21. What language was used in this political propaganda:

☒ English ***/** ***/Both Spanish and English translations were provided.** ☐ Other (specify)

22. Did you file with the Registration Section, U.S. Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period? Yes ☒ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☒ No ☐

24. Did you file with the Registration Section, U.S. Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act? Yes ☒ No ☐

VI—EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following: **N/A**

Exhibit A⁶ Yes ☐ No ☐
 Exhibit B⁷ Yes ☐ No ☐

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☒ No ☐

If yes, have you filed an amendment to these exhibits? Yes ☒ No ☐

If no, please attach the required amendment.

⁶The Exhibit A, which is filed on Form CRM-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.

⁷The Exhibit B, which is filed on Form CRM-155 (Formerly OBD-65) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

26. EXHIBIT C

If you have previously filed an Exhibit C⁸, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☐

N/A

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements been filed by all of the persons named in Items 5 and 7 of the supplemental statement? Yes ☒ No ☐

If no, list names of persons who have not filed the required statement.

N/A

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) personal knowledge.

(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

Lawrence A. Schneider

Lawrence A. Schneider

Subscribed and sworn to before me at

District of Columbia

this

26th

day of

January

, 1993

My Commission Expires May 31, 1994

Robert B. Anderson

(Signature of notary or other officer)

⁸ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, U.S. Department of Justice, Washington, D.C. 20530.)

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Attachment 3A

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

(XX) Yes

(☐) No

If yes, furnish the following information:

<u>Name</u>	<u>Position</u>	<u>Date Connection Ended</u>
Lawrence V. Stein	Partner	11/16/92

In addition, the following partners, who have previously filed Short Form Registration Statements, are not engaging in registrable activities on behalf of any of the Registrant's foreign principals, and their Short Form Registration Statements are hereby terminated:

Mark H. Boscoe
Thomas R. Dwyer
Samuel A. Flax
Melvin C. Garbow
Dennis G. Lyons
Cary H. Sherman
Rebecca E. Swenson
Kathleen M.H. Wallman

Attachment 4A

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

☒ Yes

☐ No

If yes, furnish the following information:

<u>Name</u>	<u>Residence Address</u>	<u>Citizen- ship</u>	<u>Position</u>	<u>Date Assumed</u>
Mason C. Brown	340 South Plymouth Boulevard Los Angeles, CA 90020	USA	Partner	11/9/92
Paul T. Denis	1528 Westmoreland Street McLean, VA 22101	USA	Partner	7/1/92
Merrick B. Garland	5418 Grove Street Chevy Chase, MD 20815	USA	Partner	10/8/92
Darryl W. Jackson	7112 Cheshire Court Alexandria, VA 22307	USA	Partner	7/20/92

Attachment 6A

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period?

☒ Yes

☐ No

If yes, furnish the following information:

<u>Name</u>	<u>Position or Connection</u>	<u>Date Terminated</u>
Rebecca E. Slaman	Associate	10/16/92
Anne Wallace	Of Counsel	10/16/92
Lois R. Lupica	Associate	7/17/92
Jack H. Cleland	Associate	7/8/92
Lee Ann Rooney	Associate	7/3/92
Carolyn Landever	Associate	6/12/92

In addition, the following employees, who have previously filed Short Form Registration Statements, are not engaging in registrable activities on behalf of any of the Registrant's foreign principals, and their Short Form Registration Statements are hereby terminated:

Patricia H. Anderson
Sarah Bloom
William E. Cook
Thomas M.J. Kerwin
Kent L. Killelea
Jerome I. Levinson
Cynthia M. Lewin
Andrew S. Ratzkin
James J. Silk

Attachment 7A

7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity?

() Yes

(XX) No*/

*/ However, the following persons, hired previously, began to render services to one or more of the Registrant's foreign principals during this period:

<u>Name</u>	<u>Residence</u>	<u>Position or Connection</u>	<u>Date Connection Began</u>
Patricia H. Anderson	3375 Beaverwood Lane Silver Spring, MD 20906	Associate	8/17/87
Richard L. Jacobs	2600 North Van Dorn St. #11 Alexandria, VA 22302	Associate	1/7/91
Kent L. Killelea	60 Gramercy Park North New York, NY 10010	Associate	1/10/90
Paul I. Rachlin	83 Main Street #D-1 Tarrytown, NY 10591	Associate	12/16/91
Sarah Kahn Saunders	2729 M Street N.W. Washington, DC 20007	Associate	9/16/91
Alvin H. Shrago	20 Mohawk Tr. Katonah, NY 10536	Associate	4/20/92
Sarah J. Williams	3701 Gunston Road Alexandria, VA 22302	Associate	9/18/89

Attachment 8A

8. Has your connection with any foreign principal ended during this 6 month reporting period?

(☒) Yes

(☐) No

If yes, furnish the following information:

<u>Name of Foreign Principal</u>	<u>Date of Termination</u>
Canadian Meat Council	August 4, 1992*/
Government of Chile	December 2, 1992
Government of Uzbekistan	December 4, 1992
Asociacion de Productores de Salmon y Trucha de Chile (A.G.)	December 4, 1992*/

*/ After this date, representation of this foreign principal was limited to activities exempt from registration under Section 3 of the Act.

Attachment 10A

10. In addition to those named in Items 8 and 9, if any, list the foreign principals whom you continued to represent during the 6 month reporting period.

Ameribrom, Inc.
Asociacion Colombiana de Exportadores
de Flores (Asocolflores)
Banco Central do Brasil
Bank of Montreal
British American Arts Association (U.K.) Ltd.
Government of Brazil
Government of Canada
International Telecommunications
Satellite Organization (INTELSAT)
Komatsu, Ltd.
Profilo Holding A.S.
Republic of Venezuela
State of Israel
Suramerica de Aleaciones Laminadas, C.A. (Sural)
The London Commodity Exchange (1986) Ltd.
(known also as the London Futures and
Options Exchange and the London Fox)

Attachment 11A

11. During this six month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in items 8, 9 and 10 of this statement?

(☒) Yes

(☐) No

If yes, identify each such foreign principal and describe in full detail your activities and services:

Ameribrom, Inc.

The Registrant rendered advice to the foreign principal on U.S. laws, regulations, and policies concerning import duties, trade and environmental issues, and other matters of interest to the foreign principal. In addition, the Registrant gathered information and had contacts with members of Congress and their staffs with respect to trade and tariff issues concerning bromine-based chemical products. See also response to Question 12.

Asociacion de Productores de Salmon y Trucha de Chile (A.G.)

The Registrant rendered advice to the foreign principal on U.S. laws, regulations, and policies in connection with the establishment of a U.S. subsidiary.

Asociacion Colombiana de Exportadores de Flores (Asocolflores)

The Registrant rendered advice to the foreign principal on U.S. laws, regulations, policies, and proposed legislation concerning international trade and customs classification issues. In addition, the Registrant represented the foreign principal in ongoing antidumping and countervailing duty administrative reviews by the U.S. Department of Commerce concerning imports of flowers from Colombia, as well as in appeals

of such reviews before the U.S. Court of International Trade.

Banco Central do Brasil/Government of Brazil

The Registrant rendered advice to the foreign principal on U.S. laws, regulations, legislation and policies concerning export controls, international trade, international banking, taxation, and securities. The Registrant represented the foreign principal with respect to the restructuring of Brazilian external commercial bank debt. The Registrant also rendered advice and provided services concerning the privatization of certain Brazilian state enterprises.

Bank of Montreal

The Registrant rendered advice to the foreign principal in connection with pending civil lawsuits concerning the liability of U.S. banks for deposits in foreign branches, represented the foreign principal in one such lawsuit, and rendered advice to the foreign principal with respect to the potential impact of legislation on pending cases. The Registrant also rendered advice to the foreign principal on U.S. laws, regulations, and policies concerning financial transactions, investment funds, and general securities and bankruptcy matters. The Registrant also rendered advice to the foreign principal regarding operations of its U.S. banking subsidiary and assisted the foreign principal with the incorporation of subsidiaries in the United States.

British American Arts Association (U.K.) Ltd.

One of the Registrant's partners served as a member of the Board of Directors of the principal, provided general information in response to inquiries on the services and activities of the principal and assisted the principal with respect to a bank account.

Canadian Meat Council

After August 4, 1992, all activities on behalf of this foreign principal were non-registrable activities,

including representation of the foreign principal in connection with a Section 332 investigation by the International Trade Commission with respect to live cattle and beef from Canada.

Government of Canada

The Registrant rendered advice to the foreign principal on issues related to international trade agreements and U.S. laws, regulations, and policies relating thereto.

Government of Chile

No activity.

Government of Uzbekistan

No activity.

International Telecommunications Satellite Organization (INTELSAT)

The Registrant rendered advice to the foreign principal on U.S. tax and labor laws, regulations and policies. The Registrant also represented the foreign principal and provided advice on U.S. securities laws, regulations and policies relating to the proposed issuance of bond offerings in the Euro market. In addition, the Registrant represented the foreign principal in connection with INTELSAT v. Martin Marietta Corp. in the U.S. District Court for the District of Maryland and the Fourth Circuit U.S. Court of Appeals. See also response to Question 12.

Komatsu, Ltd.

The Registrant rendered advice to the foreign principal on U.S. laws, regulations, and policies of interest to the foreign principal in the conduct of its businesses, including patents and licensing, tax, environmental, securities, trade and customs issues.

Profilo Holding A.S.

The Registrant rendered advice to the foreign principal on U.S. laws, regulations, policies, and proposed legislation that could affect or relate to activities of the foreign principal and United States-Turkey relations.

Republic of Venezuela

The Registrant assisted the foreign principal in connection with the implementation of the 1990 Financing Plan. In addition, the Registrant provided advice to the foreign principal with respect to the restructuring of Venezuelan external debt, international financial matters (including matters related to multilateral and bilateral lending institutions and foreign military sales purchases in the United States), international tax matters, intellectual property rights, including the negotiation of an Intellectual Property Rights Agreement with the United States, international trade issues, including the U.S. embargo of Venezuelan tuna, and the privatization of Fondo de Inversiones. The Registrant also provided advice on a bilateral investment treaty with the United States, and U.S. tax, trade, customs and securities laws, regulations, and policies relating to the issuance of government bond offerings in the international financial markets, as well as advice on a variety of matters relating to financing activities. The Registrant also advised the foreign principal with respect to the settlement of a lawsuit in Florida and with respect to real property securing settlement of a lawsuit. See also response to Question 12.

State of Israel

The Registrant rendered advice to the foreign principal on U.S. laws, regulations and policies including taxation, international trade, financial matters, and privatization issues. The Registrant also provided advice to the foreign principal regarding the implications of the federal Credit Reform Act on the foreign principal's U.S. loan guarantees. The Registrant represented the foreign principal in

connection with financing from the U.S. Export-Import Bank and Agency for International Development and provided advice with respect to various financing vehicles, existing and proposed, including international development financing. In connection with the foregoing and otherwise, the Registrant rendered advice to the foreign principal on U.S. banking, real estate, tax, and securities laws, regulations, policies and proposed or possible legislation concerning loan programs of the foreign principal. See also response to Question 12.

Suramerica de Aleaciones Laminadas, C.A. (Sural)

The Registrant rendered advice to the foreign principal on U.S. laws, regulations, and policies concerning international trade, customs, and finance issues. In addition, the Registrant represented the foreign principal in antidumping and countervailing duty proceedings with respect to electrical conductor aluminum redraw rod before the U.S. Department of Commerce, U.S. Court of Appeals for the Federal Circuit, and Court of International Trade. The Registrant also advised and represented the foreign principal on U.S. customs matters related to classification issues.

The London Commodity Exchange (1986) Ltd. (known also as the London Futures and Options Exchange and the London Fox)

No activity.

Attachment 12A

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity as defined below?

(XX) Yes

() No

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

Ameribrom, Inc.

On behalf of the foreign principal, the Registrant had a telephone conversation with John Harris of the Environmental Protection Agency regarding compliance with Section 4 of the Toxic Substances Control Act on October 26, 1992.

The Registrant also met with the following government officials regarding tariff reduction legislation for bromine-based chemical products: on June 8, 1992, with Eric Biel, Trade Counsel, Senate Committee on Finance; on June 19, 1992, with Andrew Samet of Senator Moynihan's staff; on June 19, 1992, with Bill Reinsch of Senator Rockefeller's staff; on June 19, 1992, with Mark Ulven of Senator Daschle's staff; on June 23, 1992, with Andrew Samet of Senator Moynihan's staff; on June 23, 1992, with Rosamund Brown of Congressman Anthony's staff; on June 23, 1992, with John Olinger of Congressman Downey's staff; and on October 5, 1992, with Brad Figel, Chief Trade Counsel, Senate Committee on Finance.

INTELSAT

On behalf of the foreign principal, the Registrant had telephone conversations with the following government officials regarding the status of the Agreement on State and Local Taxation of Foreign Employees of Public International Organizations: on August 12, 17, and 20, 1992, with Michael Scharf, Office of the Legal Adviser, Department of State; on August 17, 1992, with Lois Adler, Office of the Legal Adviser, Department of State; and on August 26, September 4 and 17, 1992, with Scott Styles, Office of Legislative Affairs, Department of State.

The Registrant also met with Lawrence Eagleburger, Deputy Secretary, Department of State, regarding INTELSAT tax issues, on August 18, 1992.

State of Israel

On behalf of the foreign principal, the Registrant had telephone conversations with James Bond, Minority Clerk, Appropriations Subcommittee on Foreign Operations regarding technical legislative issues on June 30, July 22, 29, 30, and 31, August 5, 6, 7, 10, 11, and 31, September 1, 2, 3, 4, 8, 9, 10, 11, 16, 17, 18, 21, 24, 25 and 30, October 5, and November 10, 12, 16 and 19, 1992.

The Registrant also met with James Bond, Minority Clerk, Appropriations Subcommittee on Foreign Operations regarding technical legislative issues on June 6, July 10 and 28, August 27 and September 15, 1992.

Republic of Venezuela

On behalf of the foreign principal, the Registrant had telephone conversations with the following government officials: on June 23 and 29, July 31 and August 13, 1992, with Jerome Silber, General Counsel, Defense Security Assistance Agency, Department of Defense ("DOD") regarding Financing of Foreign Military Sales purchases in the United States; on June 30, 1992, with Mike Magen of Congressman Cunningham's staff, regarding inquiries on proposed Tuna-Dolphin legislation; on June 30, 1992, with Karen Steuer of Congressman Studds' staff, regarding inquiries on

proposed Tuna-Dolphin legislation; on August 6, 1992, with Carmen Suro-Bredie, Assistant United States Trade Representative for Intellectual Property, Environment, Science and Technology, Office of the United States Trade Representative ("USTR"), regarding Venezuelan position on Tuna-Dolphin legislation; on August 6, 1992, with David Colson, Deputy Assistant Secretary, Oceans and Fisheries Affairs, Department of State, regarding Venezuelan position on Tuna-Dolphin legislation; on October 8, 1992, with Eric Biel, Trade Counsel, Senate Committee on Finance, regarding Tuna-Dolphin legislation; on October 8, 1992, with Kevin Dempsey of Senate Commerce, Science, and Transportation Committee's staff, regarding Tuna-Dolphin legislation; on October 8, 1992, with Brad Figel, Chief Trade Counsel, Senate Committee on Finance, regarding Tuna-Dolphin legislation; on October 8, 1992, with Bob Kyle, Chief International Trade Counsel, Senate Committee on Finance, regarding Tuna-Dolphin legislation; with Jill Lockett of Senator Packwood's staff, regarding Tuna-Dolphin legislation; on October 8, 1992, with Saul Singer of Senator Mack's staff, regarding Tuna-Dolphin legislation; on October 8, 1992, with Mike Converse of Senator Nickles' staff, regarding Tuna-Dolphin legislation; and on October 8, 1992, with Joshua Bolten, Deputy Assistant to the President and Director, Office of Legislative Affairs, Executive Office of the President, regarding Tuna-Dolphin legislation.

The Registrant also sent to each of the following government officials a copy of a letter from Venezuelan Agriculture Minister Jonathon Coles to Secretary of State James Baker stating the official Venezuelan position on proposed Tuna-Dolphin legislation: on July 22, 1992 to Joshua Bolten, Deputy Assistant to the President and Director, Office of Legislative Affairs, Executive Office of the President; on July 22, 1992 to David Colson, Deputy Assistant Secretary, Oceans and Fisheries Affairs, Department of State; and on October 8, 1992, to Eric Biel, Trade Counsel, Senate Committee on Finance, Kevin Dempsey of Senate Commerce, Science, and Transportation Committee's staff, Brad Figel, Chief Trade Counsel, Senate Committee on Finance, Bob Kyle, Chief International Trade Counsel, Senate Committee on Finance, Jill Lockett of Senator Packwood's staff, and Saul Singer of Senator Mack's staff, regarding Venezuelan position on Tuna-Dolphin legislation. On August 12, 1992 the Registrant sent each of the following government officials a copy of an

Intergovernmental Declaration on Tuna: Senator John Breaux, U.S. Senate, Senator John Kerry, U.S. Senate, Congressman Randy Cunningham, U.S. House of Representatives, Congressman Gerry Studds, U.S. House of Representatives, David Colson, Deputy Assistant Secretary, Oceans and Fisheries Affairs, Department of State, Daniel Esty, Deputy Assistant Administrator for Policy, Planning and Evaluation, Environmental Protection Administration, and Carmen Suro-Bredie, Assistant United States Trade Representative for Intellectual Property, Environment, Science and Technology, USTR.

The Registrant also met with the following government officials: on June 24, 1992, with Jerome Silber, General Counsel, Defense Security Assistance Agency, DOD, Bruce Rasmussen, Lieutenant Colonel, United States Air Force ("USAF"), Defense Security Agency, Latin American and Africa Division, DOD, Gerald Gendron, Jr. Lieutenant Colonel, USAF, Inter-American Region, International Security Affairs, DOD, and Kathy Leavens Roske, Financial Management Analyst, Defense Security Assistance Agency, DOD, regarding financing of Foreign Military Sales purchases in the United States; and on July 16, 1992, with Joshua Bolten, Deputy Assistant to the President and Director, Office of Legislative Affairs, Executive Office of the President, regarding Venezuelan position on proposed Tuna-Dolphin legislation.

ATTACHMENT NO. 14A

14. (a) Receipts -- Monies

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9, and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

 X Yes

 No

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.

* * *

Note: The following information relates to activities that would be exempt from registration under Section 3 of the Act, as well as activities that are not exempt.

Note: The services to which these receipts relate may have been performed in a prior period.

<u>Date</u>	<u>From Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Republic of Venezuela</u>			
08/31/92	Republic of Venezuela	Fees	\$ 384,875.37
08/31/92	Republic of Venezuela	Disbursements	57,309.09
<u>Government of Canada</u>			
07/14/92	Government of Canada	Fees	\$ 30,140.00
07/14/92	Government of Canada	Disbursements	2,464.66
07/16/92	Government of Canada	Disbursements	6,475.52
08/12/92	Government of Canada	Disbursements	3,830.29
09/22/92	Government of Canada	Fees	203.75
09/22/92	Government of Canada	Disbursements	<u>16.02</u>
		Total Fees	\$ 30,343.75
		Total Disb.	12,786.49
<u>Banco Central Do Brasil/ Government of Brazil</u>			
06/12/92	Banco Central Do Brasil	Fees	\$ 70,217.25
06/12/92	Banco Central Do Brasil	Disbursements	5,959.16
07/29/92	Banco Central Do Brasil	Fees	9,343.03
08/28/92	Banco Central Do Brasil	Fees	218,623.73
08/28/92	Banco Central Do Brasil	Disbursements	17,215.91
11/04/92	Banco Central Do Brasil	Fees	269,288.25
11/04/92	Banco Central Do Brasil	Disbursements	27,928.42
11/13/92	Banco Central Do Brasil	Fees	161,315.19
11/13/92	Banco Central Do Brasil	Disbursements	15,731.04
11/30/92	Banco Central Do Brasil	Fees	39,296.25
11/30/92	Banco Central Do Brasil	Disbursements	<u>2,499.62</u>
		Total Fees	\$ 768,083.70
		Total Disbs.	69,334.15

Receipts (cont.)

<u>Date</u>	<u>From Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Profilo Holding, A.S.</u>			
08/14/92	Ak-Pa Tekstil Ihracat	Fees	\$ 3,600.00
08/21/92	Fentex International Corp.	Fees	7,200.00
09/01/92	Turkiye is Bankasi	Fees	3,600.00
10/16/92	Enka Holding	Fees	7,200.00
11/16/92	Halk Sigorta	Fees	10,800.00
	Total Fees	\$	32,400.00
<u>State of Israel</u>			
07/13/92	State of Israel	Fees	\$ 10,000.00
07/20/92	State of Israel	Fees	897.69
07/20/92	State of Israel	Disbursements	72.09
11/06/92	State of Israel	Fees	9,627.13
11/06/92	State of Israel	Disbursements	241.59
11/12/92	State of Israel	Fees	5,000.00
11/12/92	State of Israel	Disbursements	929.06
	Total Fees	\$	25,524.82
	Total Disbs.		1,242.74
<u>Asociacion Colombiana de Exportadores de Flores (Asocolflores)</u>			
06/05/92	Asocolflores	Disbursements	\$ 29,208.33
06/09/92	Asocolflores	Fees	52,633.72
06/09/92	Asocolflores	Disbursements	8,967.41
07/02/92	Asocolflores	Disbursements	8,811.84
07/27/92	Asocolflores	Fees	45,363.75
07/27/92	Asocolflores	Disbursements	9,966.85
08/14/92	Asocolflores	Fees	1,489.61
09/29/92	Asocolflores	Fees	3,866.25
09/29/92	Asocolflores	Disbursements	577.83
10/01/92	Asocolflores	Fees	3,923.75
10/01/92	Asocolflores	Disbursements	7,409.36
10/16/92	Asocolflores	Fees	4,974.35
10/16/92	Asocolflores	Disbursements	1,798.12
10/22/92	Asocolflores	Fees	14,830.65
11/25/92	Asocolflores	Fees	1,614.00
11/25/92	Asocolflores	Disbursements	919.00
12/01/92	Asocolflores	Fees	1,053.38
12/04/92	Asocolflores	Fees	2,736.25
12/04/92	Asocolflores	Disbursements	100.95
	Total Fees	\$	132,485.71
	Total Disbs.		67,759.69

Receipts (cont.)

<u>Date</u>	<u>From Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Suramerica de Aleaciones</u>			
<u>Laminadas, C.A. (Sural)</u>			
10/26/92	Suramerica de Aleaciones	Fees	\$ 53,293.75
10/26/92	Suramerica de Aleaciones	Disbursements	8,357.09
<u>Asociacion de Productores de Salmon</u>			
<u>y Trucha de Chile (A.G.)</u>			
08/31/92	Asociacion de Productores	Fees	\$ 33,835.71
08/31/92	Asociacion de Productores	Disbursements	678.53
10/07/92	Asociacion de Productores	Fees	12,230.04
11/19/92	Asociacion de Productores	Fees	3,457.61
11/19/92	Asociacion de Productores	Disbursements	<u>843.75</u>
		Total Fees	49,523.36
		Total Disbs.	1,522.28
<u>Canadian Meat Council</u>			
09/18/92	Canadian Meat Council	Fees	\$ 6,522.50
09/18/92	Canadian Meat Council	Disbursements	268.60
10/27/92	Canadian Meat Council	Fees	6,377.50
10/27/92	Canadian Meat Council	Disbursements	1,052.90
11/16/92	Canadian Meat Council	Fees	5,770.00
11/16/92	Canadian Meat Council	Disbursements	<u>413.56</u>
		Total Fees	18,670.00
		Total Disbs.	1,735.06
<u>Komatsu, Ltd.</u>			
06/16/92	Komatsu, Ltd.	Fees	\$ 6,155.00
06/16/92	Komatsu, Ltd.	Disbursements	1,018.31
06/30/92	Komatsu, Ltd.	Fees	2,127.50
07/01/92	Komatsu, Ltd.	Fees	3,735.00
07/01/92	Komatsu, Ltd.	Disbursements	502.45
07/20/92	Komatsu, Ltd.	Fees	11,660.00
07/20/92	Komatsu, Ltd.	Disbursements	1.00
08/03/92	Komatsu, Ltd.	Fees	11,650.00
08/03/92	Komatsu, Ltd.	Disbursements	1,498.28
08/10/92	Komatsu, Ltd.	Fees	85,775.00
08/10/92	Komatsu, Ltd.	Disbursements	5,571.18
09/01/92	Komatsu, Ltd.	Fees	4,022.50
09/01/92	Komatsu, Ltd.	Disbursements	992.18
10/01/92	Komatsu, Ltd.	Fees	3,575.00
10/01/92	Komatsu, Ltd.	Disbursements	689.20
10/08/92	Komatsu, Ltd.	Fees	3,740.30
10/16/92	Komatsu, Ltd.	Fees	3,383.49
10/16/92	Komatsu, Ltd.	Disbursements	719.12
10/30/92	Komatsu, Ltd.	Fees	732.99
11/02/92	Komatsu, Ltd.	Fees	20,638.75
11/02/92	Komatsu, Ltd.	Disbursements	165.49
12/01/92	Komatsu, Ltd.	Fees	77,252.01
12/01/92	Komatsu, Ltd.	Disbursements	<u>16,003.86</u>
		Total Fees	\$ 234,447.54
		Total Disbs.	27,161.07

Receipts (cont.)

<u>Date</u>	<u>From Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Bank of Montreal</u>			
07/31/92	Bank of Montreal	Fees	\$ 100.00
09/17/92	Bank of Montreal	Fees	8,363.75
09/17/92	Bank of Montreal	Disbursements	2,262.82
10/08/92	Bank of Montreal	Fees	498.75
11/09/92	Bank of Montreal	Fees	305.00
11/09/92	Bank of Montreal	Disbursements	<u>16.81</u>
		Total Fees	\$ 9,267.50
		Total Disbs.	2,279.63
<u>Ameribrom, Inc.</u>			
07/23/92	Ameribrom, Inc.	Fees	\$ 6,560.00
07/23/92	Ameribrom, Inc.	Disbursements	342.69
08/04/92	Ameribrom, Inc.	Fees	6,335.00
08/04/92	Ameribrom, Inc.	Disbursements	180.73
09/02/92	Ameribrom, Inc.	Fees	2,135.00
09/02/92	Ameribrom, Inc.	Disbursements	110.37
10/07/92	Ameribrom, Inc.	Fees	1,745.00
10/07/92	Ameribrom, Inc.	Disbursements	43.15
11/30/92	Ameribrom, Inc.	Fees	4,000.00
11/30/92	Ameribrom, Inc.	Disbursements	<u>50.45</u>
		Total Fees	\$ 20,775.00
		Total Disbs.	727.39
<u>International Telecommunications</u>			
<u>Satellite Organization (INTELSAT)</u>			
08/03/92	INTELSAT	Fees	\$ 42,067.50
08/03/92	INTELSAT	Disbursements	1,352.94
11/04/92	INTELSAT	Fees	36,530.00
11/04/92	INTELSAT	Disbursements	<u>21,470.00</u>
		Total Fees	\$ 78,597.50
		Total Disbs.	22,822.94
<u>Government of Uzbekistan</u>			
07/21/92	Government of Uzbekistan	Fees	\$ 44,565.45
07/21/92	Government of Uzbekistan	Disbursements	12,266.33

Attachment No. 15A

15.(a) Disbursements -- Monies

During this 6 month reporting period, have you

- (1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement?

 X Yes No

- (2) transmitted monies to any such foreign principal?

 Yes X No

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

* * *

Note: The following information relates to activities that are exempt from registration under Section 3 of the Act, as well as activities that are not exempt.

Note: The services to which these expenditures relate may have been performed in a prior period.

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Profilo Holding, A.S.</u>			
Various	Xerox Corporation	Duplicating	\$ 73.75
Various	C & P Telephone	Telephone	589.41
Various	A & P Employees	Cash Expenses	172.72
Various	A & P Employees	Local Transportation	244.50
Various	A & P Attorneys	Travel Expenses*	679.82
Various	Federal Express	Courier	26.50
07/13/92	DHL Airways, Inc.	Courier	30.00
		TOTAL	\$ 1,816.70

Government of Canada

Various	Xerox Corporation	Duplicating	\$ 18.25
Various	C & P Telephone	Telephone	81.01
Various	Lexis	Computer Research	195.07
Various	National News Agency	Publications	50.88
		TOTAL	\$ 345.21

State of Israel

Various	Xerox Corporation	Duplicating	\$ 13.25
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* These travel expenses were for attorneys at the firm for travel in connection with non-registrable activities, such as for meetings with clients and third parties, and not for registrable activities.

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>British Am. Art Association (U.K.) Ltd.</u>			
Various	Xerox Corporation	Duplicating	\$ 20.50
Various	C & P Telephone	Telephone	182.22
Various	A & P Attorneys	Travel Expenses*	206.80
Various	A & P Employees	Cash Expenses	<u>6.71</u>
		TOTAL	\$ 416.23

Asociacion de Productores de Salmon y
Trucha de Chile (A.G)

Various	Xerox Corporation	Duplicating	\$ 6.00
Various	C & P Telephone	Telephone	67.25
Various	A & P Attorneys	Travel Expenses*	<u>817.47</u>
		TOTAL	\$ 890.72

Government of Uzbekistan

Various	Xerox Corporation	Duplicating	\$.75
Various	C & P Telephone	Telephone	135.81
07/21/92	A & P Employees	Cash Expenses	<u>15.00</u>
		TOTAL	\$ 151.56

(Attachment No. 15A - page 2)

* These travel expenses were for attorneys at the firm for travel in connection with non-registrable activities, such as for meetings with clients and third parties, and not for registrable activities.

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Asociacion Colombiana de Exportadores de Flores</u> <u>(Asocolflores)</u>			
Various	Xerox Corporation	Duplicating	\$ 1,371.75
Various	A & P Employees	Local Transportation	127.83
Various	C & P Telephone	Telephone	1,818.07
Various	U.S. Postal Service	Postage	143.41
Various	A & P Employees	Cash Expenses	527.50
Various	CPC Reprographics Inc.	Outside Duplicating (In antidumping case)	4,505.32
Various	Lexis	Computer Research	266.19
Various	DHL Airways, Inc.	Courier	397.68
Various	APCO Associates Three Lafayette Centre 1155 21st Street, N.W. Washington, DC 20036	Professional Serv.	348.59
Various	Capital Trade, Inc 1850 K Street, N.W. Suite 1000 Washington, DC 20006	Professional Serv. (In antidumping case)	2,456.48
07/17/92	Charles R. Mann Associates 1828 L Street N.W. Suite 950 Washington, D.C 20036-5104	Professional Serv. (In antidumping case)	524.00
Various	U.S. Department of Commerce	Outside Duplicating	551.30
Various	Federal Express	Courier	80.47
Various	Washington Express	Courier	265.00
		TOTAL	\$ 13,383.59

Suramerica de Aleaciones Laminadas, C.A. (Sural)

Various	Xerox Corporation	Duplicating	\$ 1,372.60
Various	C & P Telephone	Telephone	955.17
Various	Westlaw	Computer Research	1,107.07
Various	U.S. Postal Service	Postage	50.77
Various	A & P Employees	Cash Expenses	47.96
Various	A & P Employees	Local Transportation	35.50
Various	Washington Express	Courier	359.51
Various	Federal Express	Courier	112.80
		TOTAL	\$ 4,041.38

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Canadian Meat Council</u>			
Various	Xerox Corporation	Duplicating	\$ 444.50
Various	C & P Telephone	Telephone	531.84
Various	A & P Employees	Local Transportation	8.00
Various	A & P Employees	Cash Expenses	148.45
Various	A & P Attorneys	Travel Expenses*	521.50
Various	Federal Express	Courier	238.99
Various	Washington Express	Courier	41.00
07/20/92	U.S. Postal Service	Postage	.52
Various	National News Agency	Publications	50.88
09/25/92	Gallagher Law Library	Publications	16.95
09/08/92	Congressional Documents	Document Retrieval	10.00
		TOTAL	\$ 2,012.63

Ameribrom, Inc.

Various	Xerox Corporation	Duplicating	\$ 86.75
Various	C & P Telephone	Telephone	251.03
Various	U.S. Postal Service	Postage	.58
Various	A & P Employees	Local Transportation	61.95
Various	Lexis	Computer Research	41.00
Various	Federal Express	Courier	38.75
07/01/92	Washington Express	Courier	10.25
		TOTAL	\$ 490.31

International Telecommunications Satellite Organization
(INTELSAT)

Various	Xerox Corporation	Duplicating	\$ 1,014.55
Various	C & P Telephone Co.	Telephone	657.32
Various	U.S. Postal Service	Postage	7.74
Various	Lexis	Computer Research	500.85
Various	Westlaw	Computer Research	1,150.38
Various	Washington Express	Courier	93.25
10/19/92	Apple Courier, Inc.	Courier	22.00
11/01/92	Deluxe Delivery Service	Courier	7.50
Various	A & P Employees	Cash Expenses	8.21
Various	A & P Employees	Local Transportation	60.57
Various	A & P Attorneys	Travel Expenses*	419.56
06/10/92	Tydings and Rosenberg 100 East Pratt Street Baltimore, MD 21202	Professional Serv.	1,191.20
06/12/92	Hallasz & Hallasz	Depositions & Transcripts	84.80
11/11/92	Patricia A. Brightwell	Depositions & Transcripts	115.36
Various	Research Information Services	Document Retrieval	\$ 300.21
		TOTAL	5,633.50

(Attachment No. 15A - page 4)

* These travel expenses were for attorneys at the firm for travel in connection with non-registrable activities, such as for meetings with clients and third parties, and not for registrable activities.

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Republic of Venezuela</u>			
Various	Xerox Corporation	Duplicating	\$ 5,982.95
Various	C & P Telephone	Telephone	18,092.37
Various	A & P Employees	Cash Expenses	617.92
Various	A & P Employees	Local Transportation	2,877.37
Various	Lexis	Computer Research	2,536.10
Various	Westlaw	Computer Research	632.77
Various	U.S. Postal Service	Postage	9.89
Various	A & P Attorneys	Travel Expenses*	8,570.84
Various	Federal Express	Courier	1,406.79
Various	Washington Express	Courier	742.71
Various	DHL Airways, Inc.	Courier	460.00
Various	Apple Courier, Inc.	Courier	77.00
Various	Deluxe Delivery Systems	Courier	22.50
07/13/92	Airborne Express	Courier	13.75
Various	Andrews Office Products	Office Supplies	627.50
Various	Superintendent of Documents	Publications	65.50
Various	National News Agency	Publications	461.10
11/07/92	Government Printing Office	Publications	2.00
06/17/92	New York Public Library	Document Retrieval	143.00
06/30/92	Washington Service Bureau, Inc.	Document Retrieval	28.96
07/06/92	Research Information Service	Document Retrieval	114.28
Various	Slaughter & May 126 East 56th Street New York, New York 10022-3613	Professional Services	2,445.00
Various	Hengeler Mueller Weitzel Wirtz Deutschmarks Bockenheimer Landstrasse 51 D-6000 Frankfurt am Main 1 Germany	Professional Services	58,480.16
11/24/92	CT Corporation Systems 1025 Vermont Ave., N.W. 4th Floor Washington, D.C. 20005	Professional Services	900.00
Various	Congressional Documents	Document Retrieval	40.00
06/08/92	Pitney Bowes Mgt. Services	Outside Duplicating	129.00
Various	Washington Trade Daily	Outside Duplicating	86.50
09/09/92	Lithographics, Inc.	Outside Duplicating	114.64
10/13/92	Print House Express	Outside Duplicating	100.70
TOTAL			\$ 105,781.30

(Attachment No. 15A - page 5)

* These travel expenses were for attorneys at the firm for travel in connection with non-registrable activities, such as for meeting with clients and third parties, and not for registrable activities.

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Bank of Montreal</u>			
Various	Xerox Corporation	Duplicating	\$ 1,459.30
Various	C & P Telephone	Telephone	940.97
Various	Lexis	Computer Research	1,331.64
Various	Westlaw	Computer Research	345.02
Various	A & P Employees	Cash Expenses	169.11
Various	A & P Employees	Local Transportation	178.69
08/20/92	Research Information Services	Document Retrieval	34.28
Various	Federal Express	Courier	359.04
Various	Washington Express	Courier	63.00
09/10/92	Arlington Printers	Outside Duplicating	193.98
Various	Apple Courier, Inc.	Courier	55.00
10/15/92	DHL Airways, Inc.	Courier	20.00
Various	U.S. Postal Service	Postage	5.92
Various	CT Corporation Systems		
	1025 Vermont Ave., N.W. 4th Floor		
	Washington, D.C. 20005	Professional Services	<u>1,236.90</u>
		TOTAL	\$ 6,392.85

Komatsu Ltd.

Various	Xerox Corporation	Duplicating	\$ 2,985.75
Various	C & P Telephone	Telephone	7,577.24
Various	A & P Employees	Cash Expenses	825.20
Various	A & P Employees	Local Transportation	246.90
Various	Lexis	Computer Research	201.28
Various	Westlaw	Computer Research	24.46
Various	Federal Express	Courier	278.42
Various	Washington Express	Courier	99.26
Various	Apple Courier, Inc.	Courier	5.50
Various	DHL Airways, Inc.	Courier	175.95
11/25/92	Kinko's	Outside Duplicating	53.00
Various	U.S. Postal Service	Postage	37.56
06/18/92	Matthew Bender & Co.	Publications	461.10
Various	Butterworths	Publications	290.44
12/04/92	Government Printing Office	Publications	52.00
06/09/92	Prentice Hall	Publications	45.57
07/31/92	Coopers & Lybrand		
	Department 1103		
	Pittsburgh, PA 15264	Professional Services	2,405.00
Various	Prentice Hall	Filing Fees	636.00
Various	Prentice Hall	Document Retrieval	568.61
10/19/92	Research Information Services	Document Retrieval	68.90
06/08/92	CT Corporation Systems	Filing Fees	170.00
09/09/92	CT Corporation Systems	Document Retrieval	<u>432.75</u>
		TOTAL	\$ 17,640.89

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
<u>Banco Central do Brasil/ Government of Brazil</u>			
Various	Xerox Corporation	Duplicating	\$ 32,070.15
Various	C & P Telephone	Telephone	24,470.72
Various	Lexis	Computer Research	1,091.33
Various	Westlaw	Computer Research	2,621.12
Various	A & P Employees	Cash Expenses	1,531.77
Various	A & P Employees	Local Transportation	5,881.38
Various	A & P Attorneys	Travel Expenses*	33,833.47
Various	U.S. Postal Service	Postage	31.92
Various	Federal Express	Courier	314.54
Various	Washington Express	Courier	220.23
Various	DHL Airways, Inc.	Courier	1,679.90
Various	Apple Courier, Inc.	Courier	44.00
10/05/92	Network Courier	Courier	100.00
Various	Deluxe Delivery Systems	Courier	491.50
06/15/92	Group of Thirty	Publications	21.20
06/25/92	Prentice Hall Law & Business	Publications	72.50
Various	National News Agency	Publications	461.10
Various	Superintendent of Documents	Publications	10.00
11/30/92	Standard & Poor's Corp.	Filing Fees	88.00
06/17/92	Docutronics Information	Document Retrieval	43.15
07/15/92	New York Public Library	Document Retrieval	48.50
Various	Research Information Services	Document Retrieval	212.15
Various	Prentice Hall Legal	Document Retrieval	552.11
10/07/92	Columbia Law School Library	Document Retrieval	7.00
10/16/92	Disclosure, Inc.	Document Retrieval	94.72
11/09/92	U.S. Tax Court	Outside Duplicating	156.00
		TOTAL	\$ 106,148.46

(Attachment No. 15A - page 7)

* These travel expenses were for attorneys at the firm for travel in connection with non-registrable activities, such as for meeting with clients and third parties, and not for registrable activities.

ATTACHMENT NO. 15(c)

15(c). Disbursements-Political Contributions

During this 6-month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things or value in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

 / Yes XX / No*

*/ However, the following persons who have filed Short-Form Registration Statements have made political contributions in connection with elections for federal offices:

<u>Date</u>	<u>Amount or Thing of Value</u>	<u>Name of Political Organization</u>	<u>Name of Candidate</u>
<u>NANCY ABRAMOWITZ</u>			
1992	\$1,000.00	DNC	Various
<u>WILLIAM BAER</u>			
6/92	\$ 250.00	Clinton for President	Bill Clinton
6/15/92	\$ 125.00	Arnold & Porter Partners PAC	Various
8/92	\$ 500.00	Clinton/Gore Compliance Fund	Bill Clinton/Al Gore
9/15/92	\$ 125.00	Arnold & Porter Partners PAC	Various
10/92	\$ 500.00	Clinton/Gore Compliance Fund	Bill Clinton/Al Gore
10/92	\$ 100.00	Feingold for Senate	Russ Feingold
<u>PREETA BANSAL</u> -			
6/13/92	\$ 25.00	Braun for U.S. Senate	Carol Mosely Braun
8/20/92	\$ 100.00	DNC Victory Fund	Various
<u>PAUL BERGER</u>			
6/15/92	\$ 250.00	Arnold & Porter Partners PAC	Various
7/14/92	\$1,000.00	DNC Victory Fund/Fed. Acct.	Various
8/18/92	\$ 500.00	Solarz for Congress	Steve Solarz
8/26/92	\$ 250.00	Lieberman '94	Joseph Lieberman
8/26/92	\$ 125.00	Gejdenson Reelection Comm.	Sam Gejdenson
8/27/92	\$ 250.00	Reelect Bob Packwood	Robert Packwood
9/10/92	\$ 500.00	Solarz for Congress	Steve Solarz

9/15/92	\$ 250.00	Arnold & Porter Partners PAC	Various
9/18/92	\$2,000.00	DNC Victory Fund/Fed. Acct.	Various
9/27/92	\$ 500.00	DNC Victory Fund/Fed. Acct.	Various
10/4/92	\$ 75.00	Friends of Connie Morella	Connie Morella
11/3/92	\$1,000.00	Kasten for Senate Comm.	Robert Kasten
11/18/92	\$ 250.00	Friends of Jim Moody	Jim Moody

BLAKE BILES

7/10/92	\$ 500.00	DNC Victory Fund	Various
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PETER BLEAKLEY

6/15/92	\$ 250.00	Arnold & Porter Partners PAC	Various
8/92	\$ 500.00	DNC Victory Fund	Various
9/15/92	\$ 250.00	Arnold & Porter Partners PAC	Various

BROOKSLEY BORN

6/15/92	\$ 250.00	Arnold & Porter Partners PAC	Various
6/19/92	\$ 150.00	Carol Mosely Braun for U.S. Senate	Carol Mosely Braun
6/19/92	\$ 250.00	Ferraro for U.S. Senate	Geraldine Ferraro
6/24/92	\$ 250.00	Lynn Yeakel For Senate	Lynn Yeakel
6/24/92	\$ 250.00	Friends of Jane Harmon	Jane Harmon
9/15/92	\$ 250.00	Arnold & Porter Partners PAC	Various
9/29/92	\$1,000.00	Maryland Democratic Party Federal Account	Various
9/15/92	\$ 125.00	Gejdenson Reelection Comm.	Sam Gejdenson
9/30/92	\$ 250.00	Friends of Jane Harmon	Jane Harmon

JONATHAN BURNS

1992	\$ 25.00	Environmentally Oriented PAC	Various
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JEFFREY BURT

9/15/92	\$ 200.00	Arnold & Porter Partners PAC	Various
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WILLIAM BUSIS

8/29/92	\$ 300.00	DNC	Various
11/1/92	\$ 50.00	DNC	Various

DAPHNE BUTLER

6/13/92	\$ 25.00	Carol Mosely Braun for U.S. Senate	Carol Mosely Braun
10/9/92	\$ 17.00	DNC Victory Fund Federal Account	Various

MARGARET CAMPBELL

9/15/92	\$ 250.00	DNC Victory Fund	Various
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THOMAS CAROTHERS

7/23/92	\$ 500.00	DNC	Various
10/3/92	\$ 50.00	DNC	Various

HOWARD CAYNE

6/15/92	\$ 115.00	Arnold & Porter Partners PAC	Various
9/15/92	\$ 115.00	Arnold & Porter Partners PAC	Various

PETER CINQUEGRANI

11/92	\$ 250.00	DNC	Various
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LYNDA CLARIZIO

8/19/92	\$ 100.00	DNC Victory Fund	Various
9/4/92	\$ 250.00	DNC Victory Fund	Various

WILLIAM COOK

11/92	\$ 50.00	DNC Victory Fund	Various
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WHITNEY DEBEVOISE

6/15/92	\$ 125.00	Arnold & Porter Partners PAC	Various
9/15/92	\$ 125.00	Arnold & Porter Partners PAC	Various
7/28/92	\$ 250.00	Bush-Quayle '92	George Bush
8/1/92	\$ 250.00	Don Bonker for U.S. Senate Campaign	Don Bonker
9/26/92	\$ 100.00	Maryland Republican Party	Various

JAMES DOBKIN

6/15/92	\$ 250.00	Arnold & Porter Partners PAC	Various
9/15/92	\$ 250.00	Arnold & Porter Partners PAC	Various

A. PATRICK DOYLE

6/15/92	\$ 187.50	Arnold & Porter Partners PAC	Various
9/15/92	\$ 187.50	Arnold & Porter Partners PAC	Various

DOUGLAS DWORKIN

9/92	\$1,000.00	Maryland Democratic Party Federal Account	Various
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THOMAS DWYER

6/30/92	\$ 500.00	Don Bonker for U.S. Senate	Don Bonker
9/8/92	\$ 125.00	Gejdenson Reelection Comm.	Sam Gejdenson

JAMES FITZPATRICK

6/15/92	\$ 250.00	Arnold & Porter Partners PAC	Various
6/29/92	\$ 250.00	Don Bonker for Senate	Don Bonker
7/11/92	\$ 100.00	John Raugh for Senate	John Raugh
7/14/92	\$ 500.00	Coloradans for Lamm	Dick Lamm
8/25/92	\$ 250.00	Don Bonker for Senate	Don Bonker
9/15/92	\$ 250.00	Arnold & Porter Partners PAC	Various

SAM FLAX

6/15/92	\$ 150.00	Arnold & Porter Partners PAC	Various
9/15/92	\$ 150.00	Arnold & Porter Partners PAC	Various
10/15/92	\$ 125.00	Gejdenson Reelection Comm.	Sam Gejdenson

DAVID FREEMAN

10/15/92	\$ 50.00	DNC/Federal Account	Various
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MATTHEW FRUMIN

10/19/92	\$ 105.00	DNC/Victory Fund	Various
8/20/92	\$ 500.00	DNC/Victory Fund	Various

MELVIN GARBOW

6/15/92	\$ 200.00	Arnold & Porter Partners PAC	Various
9/15/92	\$ 200.00	Arnold & Porter Partners PAC	Various

NEIL GOODMAN

6/92	\$ - 50.00	Sid Lovett for Congress	Sid Lovett
9/92	\$ 100.00	DNC Victory Comm.	Various

JOSEPH GUTTENTAG

6/15/92	\$ 250.00	Arnold & Porter Partners PAC	Various
6/30/92	\$ 250.00	Don Bonker for U.S. Senate	Don Bonker
8/4/92	\$ 500.00	Montgomery County Democratic Party	Various
9/15/92	\$ 250.00	Arnold & Porter Partners PAC	Various

KENNETH HANDAL

9/25/92	\$ 250.00	Friends of Senator D'Amato	Se. D'Amato
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VIVIAN HOBBS

6/15/92	\$ 105.00	Arnold & Porter Partners PAC	Various
9/15/92	\$ 105.00	Arnold & Porter Partners PAC	Various

JOHN JACKSON

6/20/92	\$ 100.00	Democratic National Comm.	Various
9/6/92	\$ 125.00	Democratic National Comm.	Various

ROBERT J. JONES

6/15/92	\$ 187.50	Arnold & Porter Partners PAC	Various
9/15/92	\$ 187.50	Arnold & Porter Partners PAC	Various

HADRIAN KATZ

9/15/92	\$ 150.00	Arnold & Porter Partners PAC	Various
6/15/92	\$ 150.00	Arnold & Porter Partners PAC	Various

ABE KRASH

6/15/92	\$ 250.00	Arnold & Porter Partners PAC	Various
9/11/92	\$1,000.00	DNC Victory Fund Fed. Acct.	Various
9/15/92	\$ 250.00	Arnold & Porter Partners PAC	Various

KENNETH KRUPSKY

9/5/92	\$ 200.00	DNC Victory Fund	Various
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MICHAEL A. LEE

6/15/92	\$ 125.00	Arnold & Porter Partners PAC	Various
9/11/92	\$1,000.00	Maryland Democratic Party	Various
9/15/92	\$ 125.00	Arnold & Porter Partners PAC	Various

SUSAN LEE

8/92	\$ 250.00	Democratic National Comm. 1992 Victory Fund	Various
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KENNETH LETZLER

6/15/92	\$ 200.00	Arnold & Porter Partners PAC	Various
9/15/92	\$ 200.00	Arnold & Porter Partners PAC	Various
10/20/92	\$ 50.00	Dranesville District Democratic Comm.	Various

CYNTHIA LEWIN

7/29/92	\$ 250.00	Democratic National Comm.	Various
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JAMES LOSEY

1992	\$ 100.00	Clinton for President	Bill Clinton
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HAROLD LUKS

9/9/92	\$ 100.00	DNC	Various
9/12/92	\$ 200.00	Democratic Victory Fund	Various

DENNIS LYONS

6/15/92	\$ 250.00	Arnold & Porter Partners PAC	Various
7/1/92	\$ 100.00	Clinton for President	Bill Clinton
8/12/92	\$ 200.00	DNC	Various
6/25/92	\$ 25.00	Maryland Dollars	Various
6/25/92	\$ 100.00	Don Bonker	Don Bonker
7/10/92	\$ 25.00	Dollars for Democrats	Various
9/1/92	\$ 100.00	Maryland Democrats	Various
9/8/92	\$ 25.00	Maryland Dollars	Various
9/15/92	\$ 250.00	Arnold & Porter Partners PAC	Various
9/24/92	\$ 100.00	Democratic National Comm.	Various
9/24/92	\$ 50.00	Yates for Congress	Sydney Yates
9/30/92	\$ 50.00	Maryland for Choice	Various
10/3/92	\$ 50.00	MCDCC/Federal Acct.	Various
10/8/92	\$ 50.00	MD Dollars	Various
10/13/92	\$ 100.00	DNC Victory Fund	Various
10/29/92	\$ 50.00	Leahy for U.S. Senate	Sen. Leahy
10/29/92	\$ 100.00	DNC Federal Account	Various

ROBERT MANNION

6/15/92	\$ 150.00	Arnold & Porter Partners PAC	Various
9/15/92	\$ 150.00	Arnold & Porter Partners PAC	Various

CATHERINE COLLINS MCCOY

6/15/92	\$ 125.00	Arnold & Porter Partners PAC	Various
9/15/92	\$ 125.00	Arnold & Porter Partners PAC	Various

THOMAS MCGREW

6/15/92	\$ 100.00	Arnold & Porter Partners PAC	Various
9/15/92	\$ 100.00	Arnold & Porter Partners PAC	Various

JEFFREY MENDELSON

9/16/92	\$ 100.00	DNC Victory Fund	Various
10/21/92	\$ 100.00	NY State Democratic Comm.	Various

THOMAS MILCH

8/92/92	\$1,000.00	Democratic National Comm.	Various
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NANCY MINTZ

6/15/92	\$ 162.50	Arnold & Porter Partners PAC	Various
9/15/92	\$ 162.50	Arnold & Porter Partners PAC	Various

ROBERT MINTZ

6/15/92	\$ 85.00	Arnold & Porter Partners PAC	Various
9/15/92	\$ 85.00	Arnold & Porter Partners PAC	Various

BRUCE MONTGOMERY

6/15/92	\$ 250.00	Arnold & Porter Partners PAC	Various
9/15/92	\$ 250.00	Arnold & Porter Partners PAC	Various
10/2/92	\$ 500.00	MD Democratic Party	Various

SUSAN MORITA

9/92	\$ 250.00	DNC Victory Fund	Various
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IRV NATHAN

6/15/92	\$ 125.00	Arnold & Porter Partners PAC	Various
9/15/92	\$ 125.00	Arnold & Porter Partners PAC	Various

JOSEPH OPICH

9/16/92	-\$ - 50.00	DNC	Various
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MICHAEL OSHIMA

9/30/92	\$ 100.00	DNC Victory Fund	Various
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KEITH PATTIZ

6/15/92	\$ 125.00	Arnold & Porter Partners PAC	Various
9/15/92	\$ 125.00	Arnold & Porter Partners PAC	Various

ROBERT RABEN

7/21/92	\$ 50.00	Carol Mosely Braun	Carol Mosely Braun
9/11/92	\$ 100.00	DNC	Various
11/3/92	\$1,750.00	HRCF	Various

ANDREW RATZKIN

6/5/92	\$ 100.00	Bill Clinton for President	Bill Clinton
10/15/92	\$ 20.00	Virginia Democratic Party	Various

CLAIRE READE

6/15/92	\$ 125.00	Arnold & Porter Partners PAC	Various
9/15/92	\$ 125.00	Arnold & Porter Partners PAC	Various
9/92	\$ 500.00	Montgomery County Democrats	Various
9/92	\$ 500.00	Don Bonker for U.S. Senate	Don Bonker

DANIEL REZNECK

6/15/92	\$ 225.00	Arnold & Porter Partners PAC	Various
9/15/92	\$ 225.00	Arnold & Porter Partners PAC	Various

WALTER ROCKLER

6/22/92	\$ 40.00	Sanders for Cong.	Sanders
9/8/92	\$ 200.00	DNC	Various
9/15/92	\$ 50.00	Sanders for Cong.	Sanders
9/21/92	\$ 40.00	Gejdenson for Cong.	Sam Gejdenson
9/21/92	\$ 40.00	Dellums for Cong.	Ron Dellums
9/21/92	\$ 40.00	Lynn Yeakel for Senate	Lynn Yeakel
9/29/92	\$ 100.00	DNC	Various
10/19/92	\$ 35.00	Carol Mosely Braun for Senate	Carol Mosely Braun

WILLIAM ROGERS

6/15/92	\$ 250.00	Arnold & Porter Partners PAC	Various
9/15/92	\$ - 250.00	Arnold & Porter Partners PAC	Various
6/22/92	\$ 100.00	Clinton for President Comm.	Bill Clinton
7/6/92	\$ 250.00	Don Bonker for U.S. Senate Comm.	Don Bonker
8/13/92	\$ 250.00	DNC	Various
8/20/92	\$2,000.00	DNC Victory Fund	Various
8/5/92	\$ 25.00	Tom Barlow for Congress	Tom Barlow
8/28/92	\$ 50.00	Gejdenson for Reelection	Sam Gejdenson
9/14/92	\$1,000.00	DNC	Various
9/10/92	\$ 50.00	Don Bonker for Senate	Don Bonker

SARAH KAHN SAUNDERS

7/13/92	\$ 150.00	Bill Clinton for President	Bill Clinton
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LAWRENCE A. SCHNEIDER

6/15/92	\$ 175.00	Arnold & Porter Partners PAC	Various
6/23/92	\$ 500.00	Don Bonker for U.S. Senate	Don Bonker
6/29/92	\$ 150.00	Carol Mosely Braun for U.S. Senate	Carol Mosely Braun
9/11/92	\$ 500.00	Don Bonker for U.S. Senate	Don Bonker
9/15/92	\$ 175.00	Arnold & Porter Partners PAC	Various

MATTHEW SEIDEN

7/27/92	\$ 50.00	DNC	Various
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CARY SHERMAN

6/15/92	\$ 100.00	Arnold & Porter Partners PAC	Various
6/26/92	\$ 250.00	Don Bonker for U.S. Senate	Don Bonker
8/27/92	\$ 35.00	Carol Mosely Braun for Senate	Carol Mosely Braun
9/10/92	\$ 125.00	Gejdenson Reelection Comm.	Sam Gejdenson
9/15/92	\$ 25.00	Arnold & Porter Partners PAC	Various
10/20/92	\$ 250.00	Schiliro for Congress Campaign Comm.	Phil Schiliro

MICHAEL SHOR

6/15/92	\$ 85.00	Arnold & Porter Partners PAC	Various
9/15/92	\$ 85.00	Arnold & Porter Partners PAC	Various

JAMES SILK

10/1/92	\$ 25.00	DNC	Various
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JEFFREY SMITH

6/15/92	\$ 115.00	Arnold & Porter Partners PAC	Various
9/15/92	\$ 115.00	Arnold & Porter Partners PAC	Various
1992	\$ 250.00	Maryland Democratic Party Federal Account	Various

MARK STUMPF

6/15/92	\$ 187.50	Arnold & Porter Partners PAC	Various
9/15/92	\$ 187.50	Arnold & Porter Partners PAC	Various

STEVEN G. TEPPER

6/15/92	\$ 62.50	Arnold & Porter Partners PAC	Various
9/15/92	\$ 62.50	Arnold & Porter Partners PAC	Various

DANIEL WALDMAN

6/15/92	\$ 115.00	Arnold & Porter Partners PAC	Various
9/15/92	\$ 115.00	Arnold & Porter Partners PAC	Various

KATHLEEN WALLMAN

6/15/92	\$ 100.00	Arnold & Porter Partners PAC	Various
6/24/92	\$ 125.00	Cand. Comm. for Carol M. Braun	Carol Braun
6/24/92	\$ 100.00	Cand. Comm. for Don Bonker	Don Bonker
7/2/92	\$ 250.00	Cand. Comm. for Rose DeLauro	Rose DeLauro
7/9/92	\$ 150.00	Cand. Comm. for Robert Packwood	Robert Packwood
8/92	\$ 250.00	Cand. Comm. for Alan Wheat	Alan Wheat
9/9/92	\$ 500.00	Boxer for Senate	Boxer
9/9/92	\$ 500.00	Pennsylvanians for Kanjorski	Kanjorski
9/15/92	\$ 100.00	Arnold & Porter Partners PAC	Various
9/22/92	\$ 500.00	Rob Andrews for Congress	Rob Andrews
10/3/92	\$ 100.00	Yeakel for Senate	Lynn Yeakel
10/23/92	\$ 100.00	Pennsylvanians for Kanjorski	Kanjorski
11/29/92	\$ 100.00	Sen. Bob Kerrey (Debt Retirement)	Sen. Bob Kerrey

RICHARD WERTHEIMER

6/15/92	\$ 250.00	Arnold & Porter Partners PAC	Various
9/15/92	\$ 250.00	Arnold & Porter Partners PAC	Various

ROBERT WINTER

1992	\$2,500.00	DNC	Various
6/15/92	\$ 250.00	Arnold & Porter Partners PAC	Various
9/15/92	\$ 250.00	Arnold & Porter Partners PAC	Various

KENT YALOWITZ

11/92	\$ 100.00	DNC	Various
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